

SIGAL CHATTAH, NVSBN 5634  
 United States Attorney  
 District of Nevada

DAVID PRIDDY, ILSBN 6313767  
 Special Assistant United States Attorney  
 Social Security Administration  
 Office of the General Counsel, Office 7  
 6401 Security Boulevard  
 Baltimore, MD 21235  
 Telephone: (510) 970-4801  
 Facsimile: (415) 744-0134  
 E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA DEL ROCIO MARIN

Plaintiff,

v.

FRANK BISIGNANO,  
 Commissioner of Social Security,

Defendant.

Case No.: 2:25-cv-000505-BNW

**UNOPPOSED MOTION FOR  
 EXTENSION OF TIME  
 (FIRST REQUEST)**

Defendant, Frank Bisignano, Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 11, filed on June 17, 2025), currently due on July 17, 2025, by 32 days, through and including August 18, 2025. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to September 2, 2025.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant's counsel must take several days of medical leave, which prevents Defendant's counsel from being able to work on this response. Counsel is also responsible for writing

1 briefs defending the Commissioner in multiple other district court cases with concurrent due dates. In  
2 addition, counsel is responsible for other substantive non-litigation matters in the Office of General  
3 Counsel.

4 Additional time is required to review the record, to evaluate the issue raised in Plaintiff's brief,  
5 to determine whether options exist for settlement, and if not, to prepare Defendant's response to  
6 Plaintiff's brief. Defendant's counsel will endeavor to complete these tasks as soon as possible. This  
7 request is made in good faith and with no intention to unduly delay the proceedings, and counsel  
8 apologizes for any inconvenience.

9 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on July 15,  
10 2025. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

11 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's  
12 Brief, through and including August 18, 2025.

13  
14 Dated: July 15, 2025

Respectfully submitted,

15 SIGAL CHATTAH  
16 United States Attorney

17 /s/ David Priddy  
18 DAVID PRIDDY  
19 Special Assistant United States Attorney

20  
21 IT IS SO ORDERED:

22   
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 7/17/2025  
25  
26

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc V. Kalagian  
Law Offices of Lawrence D. Rohlfing, Inc., CPC  
12631 East Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670  
562-868-5886  
Fax: 562-868-8868  
Email: marc.kalagian@rksslaw.com

Leonard Stone  
Shook & Stone, Chtd.  
710 South 4th Street  
Las Vegas, NV 89101  
701-385-2220  
Fax: 702-384-0394  
Email: mrobles@shookandstone.com

Attorneys for Plaintiff

Dated: July 15, 2025

/s/ David Priddy  
DAVID PRIDDY  
Special Assistant United States Attorney